

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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Daniel Williams,

Plaintiff,

v.

Hassan M. Ahmed, Stephen J. Nill,
Edward T. Anderson, Paul J. Ferri,
and Paul J. Severino,

Defendants,

and

Sonus Networks, Inc.,

Nominal Defendant.

Case No. 04-10359DPW


**JOINT NOTICE AND STIPULATION OF NO OPPOSITION TO MOTION
FOR STAY OF PROCEEDINGS**

Plaintiff Daniel Williams, following consultations between his counsel and counsel for defendants Hassan M. Ahmed, Stephen J. Nill, Edward T. Anderson, Paul J. Ferri, Paul J. Severino (the "Individual Defendants"), and Nominal Defendant, Sonus Networks, Inc. ("Sonus") (collectively, the "Defendants"), hereby states that he does not oppose the Defendants' March 22, 2004 Motion for a Stay of these Proceeding and stipulates to such a stay of proceedings, for the reasons set forth in the Defendants' Motion. Plaintiff does not, however, stipulate to the Defendants' alternative motion to dismiss. The parties further stipulate and agree that Plaintiff shall have 30-days from the end of the stay of these proceedings in which to file a response to that alternative motion to dismiss, and Defendants shall have 14 days from the filing of any such opposition in which to file a reply.

FOR THE FOREGOING REASONS, the parties respectfully request that the Court stay this matter pending resolution of the motions to dismiss in the following actions now pending in the Business Section of Suffolk County Superior Court for the Commonwealth of Massachusetts: Brian Tillman v. Hassan Ahmed, Rubin Gruber, Edward Anderson, Paul Ferri, Albert Notini, Paul Severino, Paul Jones, Edward Harris, J. Michael O'Hara and Stephen Nill, Civ. No. 04-0754-BLS and Steven Palma v. Hassan Ahmed, Rubin Gruber, Edward Anderson, Paul Ferri, Albert Notini, Paul Severino, Paul Jones, Edward Harris, J. Michael O'Hara and Stephen Nill, Civ. No. 04-0753-BLS.

DANIEL WILLIAMS,

By his attorneys,



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HASSAN AHMED, PH.D.

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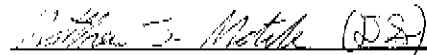
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Attorneys for Defendant Stephen Nill

Dated: April 12, 2004

CERTIFICATE OF SERVICE

I, Daniel Gold, hereby certify that I have this 12th day of April, 2004 caused to be served upon Plaintiffs' Counsel the Joint Notice And Stipulation Of No Opposition To Motion For Stay Of Proceedings by causing a copy to be delivered by hand to Alan L. Kovacs, Esq., 2001 Beacon Street, Suite 106, Boston, Massachusetts 02135.

A handwritten signature in cursive script, appearing to read "Daniel Gold", is written over a horizontal line.

Daniel Gold